

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LAW OFFICES OF LEE M. PERLMAN
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In Re:
Loren Robinson

Case No.: 19-25547 MBK
Chapter: 13
Hearing Date: 07/26/2023
Judge: MBK

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor(s) in this case opposes the following (choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,
A hearing has been scheduled for _____, at _____.

☒ Motion to Dismiss filed by the Chapter 13 Trustee.
A hearing has been scheduled for July 26, 2023, at 9:00 AM.

☐ Certification of Default filed by _____.
I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

☒ Other (explain your answer):

The mortgage lender refuses to consider us for a loan modification. We have applied to the September 11th Victim's Compensation Fund. Our application is being expedited. I will file a modified plan to continue paying a dividend to my unsecured creditors while we seek a means to bring the mortgage current, outside of the bankruptcy.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 07/19/2023

/s/ Loren Robinson
Debtor's Signature